

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF MISSISSIPPI  
JACKSON DIVISION

JIMMIE HARTFIELD

Plaintiff

VERSUS

MARRIOTT INTERNATIONAL, INC.  
REGINA LATTIMORE, INDIVIDUALLY  
and as MANAGER/ASSISTANT MANAGER  
OF MARRIOTT INTERNATIONAL, INC.  
and JOHN DOES 1-10

Defendants

\*

\*

\*

CA NO:17-cv-00461-DPJ-FKB

\*

JUDGE DANIEL P. JORDAN

\*

\*

MAGISTRATE F. KEITH BALL

\*

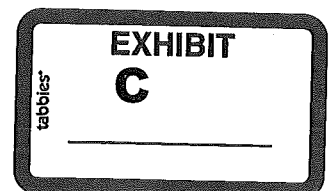
AFFIDAVIT OF DAVID ROMINES

COUNTY OF \_\_\_\_\_

STATE OF \_\_\_\_\_

BEFORE ME, the undersigned authority, came and appeared DAVID ROMINES, who, after first being duly sworn, did depose and state:

1. He is a person of full age and majority and competent to testify to these matters at trial;
2. He is familiar with the claims asserted by Jimmie Hartfield in this lawsuit relating to her injuries allegedly sustained in the parking lot of the Jackson Marriott Hotel at 200 E. Amite Street in Jackson, Mississippi, on January 24, 2014;
3. He was the General Manager of the Jackson Marriott Hotel at the time of the accident that is the subject of this litigation;
4. He investigated the subject accident involving Ms. Hartfield, including inspecting the area in the parking lot where the alleged incident occurred the following day, and taking the photographs attached to this Affidavit as Exhibits "1" and "2";
5. While he was the General Manager of the Jackson Marriott Hotel, the hotel's Chief Engineer would perform quarterly Safety Inspections of the entire premises, including the hotel parking lot;



6. The quarterly Safety Inspection immediately prior to Ms. Hartfield's alleged accident was performed on November 29, 2013, and no maintenance or safety concerns were noted in the parking lot;
7. As the General Manager, it was his practice to walk through the subject parking lot in performing a visual inspection for general cleanliness, as well as maintenance and safety issues or concerns;
8. During these walk-through inspections of the parking lot, he would observe the conditions of the ground, walls, lighting, parking areas and roadway to ensure that the premises were clean, safe and in good repair;
9. Generally, he would perform these walk-through inspections of the parking lot approximately 4 times per week;
10. At no time prior to the subject accident did he observe the alleged defect that Ms. Hartfield asserts caused her accident;
11. At no time prior to the subject accident was the hotel otherwise notified of the alleged defect that Ms. Hartfield asserts caused her accident;

  
DAVID ROMINES

SWORN TO AND SUBSCRIBED

BEFORE ME THIS 27 DAY

OF June, 2018.

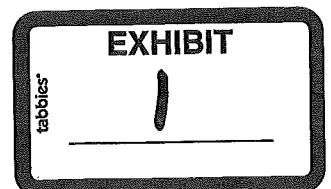
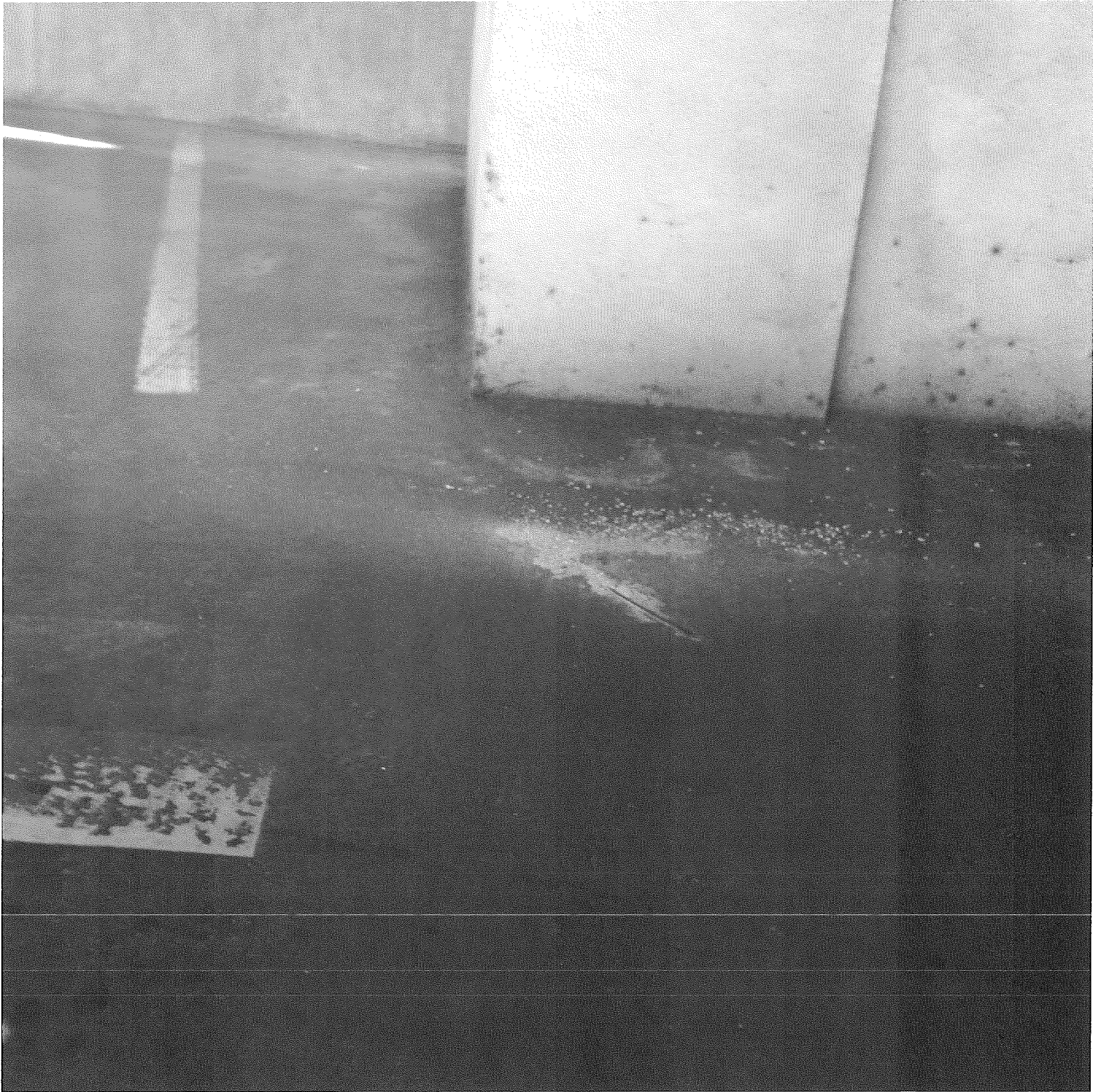
  
NOTARY PUBLIC

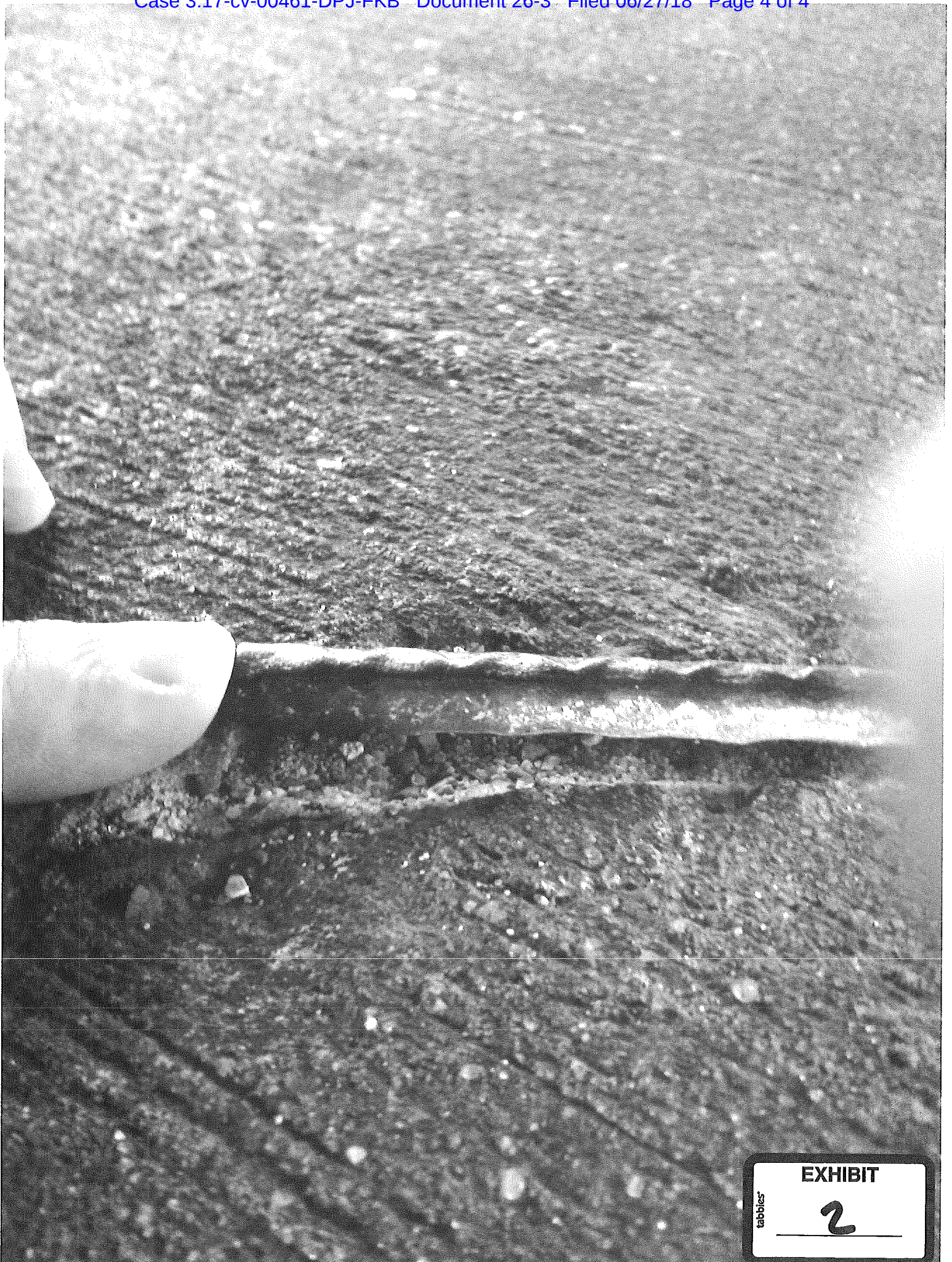
Clineetta Birmingham  
(Printed Name)

Clineetta Birmingham  
Notary Public  
Clayton County, Georgia  
My Commission Expires February 11, 2019

(seal)

Clineetta Birmingham  
Notary Public  
Clayton County, Georgia  
My Commission Expires February 11, 2019





EXHIBIT

2

tabbies